

**FILED**

12/10/2020

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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Judge Manish S. Shah

Magistrate Judge M. David Weisman

UNITED STATES OF AMERICA

v.

JEREMIAH HARRIS

No. 20 CR 637

Violations: Title 18, United States Code,  
Sections 2251(a), 2252A(a)(2)(A) and  
(b)(1), 2422(b) and 2423(b)

COUNT ONE

The SPECIAL JANUARY 2020 GRAND JURY charges:

Beginning from approximately in or around December 2018 and continuing to approximately in or around March 2020, at Naperville, in the Northern District of Illinois, Eastern Division, and elsewhere,

JEREMIAH HARRIS,

defendant herein, did knowingly use, persuade, induce, and entice a minor, namely Minor 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

**COUNT TWO**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about May 3, 2019, at Orlando, in the Middle District of Florida, Orlando Division,

JEREMIAH HARRIS,

defendant herein, using a facility and means of interstate commerce, namely, the internet, did knowingly persuade, induce, and entice Minor 1, a minor who had not attained the age of 18 years, to engage in sexual activity for which the defendant could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

**COUNT THREE**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

Beginning from approximately in or around July 2020 and continuing to approximately in or around August 2020, at Naperville, in the Northern District of Illinois, Eastern Division, and elsewhere,

**JEREMIAH HARRIS,**

defendant herein, knowingly received and attempted to receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate commerce, and that had been shipped and transported in and affecting interstate commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

**COUNT FOUR**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

Beginning from approximately in or around July 2020 and continuing to approximately in or around August 2020, at Naperville, in the Northern District of Illinois, Eastern Division, and elsewhere

JEREMIAH HARRIS,

defendant herein, did knowingly use, persuade, induce, and entice a minor, namely Minor 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

**COUNT FIVE**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

Beginning from approximately in or around February 2019 and continuing to approximately in or around May 2019, at Corsicana, in the Northern District of Texas, Dallas Division, and elsewhere,

JEREMIAH HARRIS,

defendant herein, did knowingly use, persuade, induce, and entice a minor, namely Minor 4, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

**COUNT SIX**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

Beginning from approximately in or around August 2017 and continuing to approximately in or around May 2019, at Corsicana, in the Northern District of Texas, Dallas Division, and elsewhere,

JEREMIAH HARRIS,

defendant herein, did knowingly use, persuade, induce, and entice a minor, namely Minor 5, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).



**COUNT SEVEN**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about May 2, 2019, at Dallas, in the Northern District of Texas, Dallas Division, and elsewhere,

JEREMIAH HARRIS,

defendant herein, traveled in interstate commerce, from Texas to Florida, for the purpose of engaging in illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), in that he traveled with intent to engage in a sexual act with Minor 5, who was 15 years old, and who was at least four years younger than defendant;

In violation of Title 18, United States Code, Section 2423(b).

**FORFEITURE ALLEGATION**

The SPECIAL JANUARY 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2251 or 2252A as set forth in this Indictment, defendant shall forfeit to the United States of America any matter which contains visual depictions described in Title 18, United States Code, Section 2252A; any property constituting and traceable to gross profits and other proceeds obtained from such offense; and any property used and intended to be used to commit and to promote the commission of such offense, and any property traceable to such property, as provided by Title 18, United States Code, Section 2253(a).

2. The property to be forfeited includes, but is not limited to the following specific property: an Apple iPhone 11 Pro Max, S/N G6TCC8AYN70K, bearing IMEI 353892108825699.

A TRUE BILL:

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FOREPERSON

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Signed by Timothy J. Storino on behalf of the  
UNITED STATES ATTORNEY